

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-cr-20102-RAR

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILBER ROSENDO NAVARRO-ESCOBAR,

Defendant.

DEFENDANT'S MOTION TO SEAL

Defendant, WILBER ROSENDO NAVARRO-ESCOBAR, by and through his undersigned counsel, files his Motion to Seal and respectfully requests that Defendant's *ex parte* Motion Requesting Authorization of Expenditure of Criminal Justice Act Funds and any resulting Order therefrom be SEALED, as the information contained therein is defense work product.

WHEREFORE, undersigned counsel moves this Honorable Court to enter its Order granting this Motion to Seal, for the foregoing reasons.

DATED: May 16, 2025.

Respectfully submitted,

Donet, McMillan & Trontz, P.A.

By: /s/ David A. Donet, Jr.

David A. Donet, Jr., Esq.

Florida Bar No.: 128910

Attorney for Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 16, 2025, undersigned counsel electronically filed the foregoing Defendant's Motion to Seal with the Clerk of the Court using CM/ECF, which will send a Notice of Electronic Filing (NEF) to all counsel of record, and that a copy thereof was emailed to Larry Dash, Esq., CJA Case Budgeting Attorney, United States Courts of the Fourth Circuit, at Larry_Dash@ca4.uscourts.gov.

Donet, McMillan & Trontz, P.A.

By: /s/ David A. Donet, Jr.
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